

3. The disclosure of Privileged Information in the Fee Schedule (or any subsequent documents itemizing IRAP's attorneys' fees and litigation costs) does not constitute a waiver of attorney-client privilege, work product privilege or any other applicable privilege that pertains to IRAP's communications.

4. The unredacted Fee Schedule (and any subsequent documents itemizing IRAP's attorneys' fees and litigation costs that also contain Privileged Information) shall be maintained by Defendants on an "Attorneys' Eyes Only" basis and, as such, may be used only for purposes of this action and shall not be disclosed by Defendants to any persons other than the following:

- a. The attorneys for Defendants who have filed an appearance in this action, and any employees of Defendants or the Department of Justice who are involved in the process for determining Defendants' response to Plaintiff's attorney's fees demand(s) in this action;
- b. Any expert or consultant expressly retained by any attorney described in Paragraph 4(a), with disclosure only to the extent reasonably necessary to perform such work;
- c. The Court, jury, court personnel, court reporters, and other persons connected with the Court; and
- d. Any other person whom IRAP agrees may have access.

5. Defendants will not file Privileged Information from the Fee Schedule on the public docket unless it first obtains permission to do so from IRAP or leave from the Court.

6. This Stipulation and Protective Order may be changed only by further agreement of the parties in writing or by an order of the Court. This Stipulation and Protective Order shall

remain in full force and effect until modified, superseded, or terminated either by consent of the parties, or by order of the Court.

Dated: New York, New York
March 29, 2022

STIPULATED AND AGREED BY:

DAVIS WRIGHT TREMAINE LLP

By: /s/ John M. Browning

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*Attorneys for Defense Contract Management
Agency and U.S. Department of Defense*

SO ORDERED:

March 30, 2022
New York, NY

/s/ Alvin K. Hellerstein

Hon. Alvin K. Hellerstein